

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Unlicensed Operation in the TV Broadcast Bands)	ET Docket No. 04-186
)	
Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band)	DT Docket No. 02-380
)	

COMMENTS OF IEEE-BTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

The IEEE Broadcast Technology Society (“IEEE-BTS”) hereby supports the Motion for Extension of Time filed by the IEEE 802.18 Radio Regulatory Technical Advisory Group (“IEEE 802.18”) in the above-referenced dockets. IEEE-BTS agrees with IEEE 802.18 that allowing all parties additional time to prepare comments and reply comments regarding the Commission’s proposal to allow unlicensed device operation in the television broadcast spectrum will further the public interest and will have no negative impact.

We agree with the argument of IEEE 802.18 that the Commission’s NPRM raises many complex and challenging technical issues that require further study. Additional time is needed for discussions among the interested parties in order to develop consensus and provide the best possible input to the Commission.

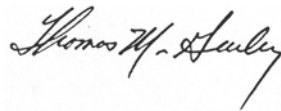
IEEE-BTS is an organization, within the framework of the IEEE, of more than 2000 members with technical interests in broadcast technology. Our field of interest covers devices, equipment, techniques and systems related to broadcast technology, including the production, distribution, and propagation aspects.

Members of IEEE-BTS are participating in the deliberations of IEEE 802.18, alongside the other stakeholders. We are committed to additional efforts toward the necessary technical studies and discussions, given the reasonable extension of time that IEEE 802.18 has requested.

We support the Commission's goals of increasing the efficiency of spectrum utilization and enabling the delivery of new broadband services to the public. However, we are especially concerned about the potential for interference from unlicensed devices to the existing, licensed broadcast television service. We believe that the ongoing cooperative effort among representatives of the unlicensed device community, television broadcasters, public safety interests, and consumer electronics manufacturers is the best path toward optimum technical and regulatory solutions to the challenges we face in achieving those goals, while preserving the quality of service of over-the-air television.

Therefore, IEEE-BTS requests that the Commission promptly grant the extension of the comment and reply comment deadlines being sought by IEEE 802.18.

Respectfully submitted,

A handwritten signature in cursive script, reading "Thomas M. Gurley".

Thomas M. Gurley
President
IEEE Broadcast Technology Society

c/o IEEE Technical Activities
445 Hoes Lane
Piscataway, NJ 08855-1331
tgurley@ieee.org